



New Hampshire Fish and Game Department

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January 30, 2020

Danielle Gaito
US Environmental Protection Agency- Region 1
5 Post Office Square, Suite 100 (06-4)
Boston, MA 02109-3912

Re: Public Comments NPDES Application No. NH0000710- Powder Mill State Fish hatchery

Dear Ms. Gaito,

Thank you for the opportunity to review and comment on the draft NPDES permit for the Powder Mill State Fish Hatchery (NH000710). After reviewing the draft permit, there are several areas we would like to address.

First, in the fact Sheet on page 12 under section 3.2, paragraph 2. "Hatchery House" water should be included with Outfall 002. The current Fact Sheet suggest that the water from the Hatchery House discharges through Outfall 001. Also in section 3.2, paragraph one, the Fact Sheet suggests that the facility "pumps water from Merrymeeting Lake". Although Merrymeeting Lake is the water supply for the Powder Mill Fish Hatchery, water is gravity fed from a submerged collection box through a series of water supply pipelines. No active mechanical pumping occurs.

Secondly, Figure 3: Schematic of Water Flow depicts the incorrect "Solids Treatment Tanks" in the diagram. The three rearing tanks that have been modified into solids storage and treatment tanks are two raceways over to the left in the diagram.

The third concern we have in the draft permit is under section E: State Permit Condition. Specifically section 4 "Compliance Schedule". This section details a compliance schedule which is dependent on an application and loan process consistent with NHDES' CWSRF program. Although the NHFG intends on applying for funds consistent with the schedule detailed within the draft permit, there is no guarantee that these funds will be awarded and the NHFGD may need to seek alternative funding through the State of New Hampshire's Capital Budget process. If this scenario was to occur, NHFGD will not have an appropriation in time to meet the compliance schedule detailed in the draft permit.

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Also, depending on the Wastewater Treatment Plan Design, there is a possibility that NHFG may need to consolidate outfalls 001 and outfall 002. There is also a potential that the design may require us to move an outfall to another location onsite in the event that we need to adjust for a larger footprint or to provide the appropriate gradient for whatever system is in the proposed design.

Lastly, the NHFGD request that the range of pH values in the permits be adjusted from a range of 6.5-8.0 s.u. to 6.0-8.0 s.u. as we have had in some of our NHFG Hatchery NPDES permits in the past. The water supply for the hatchery is Merrymeeting Lake and is already listed on the NHDES 303(d) list in NH as an impaired waterbody for pH due to acid deposition (Fact Sheet page 20, section 5.1.4). Data collected from hatchery staff shows that the influent water for outfall 002 had an average pH of 6.31 s.u. from 1/6/16-1/2/2020 (data available upon request). Although the draft permit allows the facility to demonstrate compliance by determining that the outfall is within 0.5 s.u. of the influent pH, NHFG feels that lowering the allowable pH range to 6.0-8.0 would more accurately reflect the conditions of the water source and would reduce the need for additional sampling and reporting. According to the chart included in the document "Environmental Fact Sheet, Acid Rain (Deposition), NHDES 2019", acid deposition for central New Hampshire still falls below 5.0 s.u. and should be considered.

Thank you for the opportunity to provide you with these comments for consideration. Please do not hesitate to contact me if you have any questions or would like to request additional information.

Sincerely,

A handwritten signature in black ink that reads "Jason M. Smith". The signature is written in a cursive, flowing style.

Jason M. Smith
Chief, Inland Fisheries Division